

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

MAXWELL KADEL, et al.,

Plaintiffs,

v.

DALE FOLWELL, et al.,

Defendants.

No. 1:19-cv-00272-LCB-LPA

SUPPLEMENTAL DECLARATION OF AMY RICHARDSON

I, Amy Richardson, do hereby declare as follows:

1. I am more than 18 years of age, have personal knowledge of the facts set forth herein, and am otherwise competent to testify to the matters set forth herein.
2. I am a partner with Harris, Wiltshire & Grannis LLP, and counsel for Plaintiffs in this matter. I submit this declaration in support of Plaintiffs' Opposition to State Health Plan Defendants' Motion for Partial Summary Judgment.
3. Attached to this declaration as Exhibit A is an excerpt from the deposition transcript of Plaintiff Sgt. Dana Caraway, not already filed with the court. It is a true and correct copy of the document.
4. Sensitive, protected, and/or irrelevant information has been redacted on certain pages of the attached exhibits in accordance with Federal Rule of Civil Procedure 5.1(a) and Local Rule 5.4(a)(3), with black boxes placed over the redacted text.

I declare under penalty of perjury under the laws of the United States of America
that the foregoing is true and correct.

Dated: December 30, 2021

/s/ Amy Richardson

Amy Richardson

CERTIFICATE OF SERVICE

I certify that the foregoing document was filed electronically with the Clerk of Court using the CM/ECF system which will send notification of such filing to all registered users.

Dated: December 30, 2021

/s/ Amy E. Richardson
Amy E. Richardson
N.C. State Bar No. 28768
HARRIS, WILTSIRE & GRANNIS LLP
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Exhibit A

1 break because I think we've been going for quite a
2 while.

3 (SHP Exhibit 7, Caraway Payment
4 Advice, marked for identification, as of this
5 date.)

6 Q. Sergeant Caraway, have you seen a
7 document like this before?

8 A. Yes.

9 Q. Would you refer to this as your pay
10 advice?

11 A. That would be a monthly pay stub, yes.

12 Q. Does that include various deductions for
13 benefits; is that correct?

14 A. Correct.

15 Q. You mentioned SEANC dues. Is that one
16 of the deductions there?

17 A. That is one of the deductions.

18 Q. It looks like at the top there is says
19 BYUP 8020 PT. Is that the deduction for the State
20 Health Plan?

21 A. No. That is my monthly out-of-pocket
22 expense for the State Health Plan.

23 Q. The deduction from your pay for the cost
24 of the State Health Plan?

25 A. Yes.



**Exhibit
0007 SHP
Caraway**

Pay Period: 05/01/2020 through 05/31/2020 Check Date: 05/29/2020				Name: [REDACTED] Caraway Organization: 1901-Public Safety	Personnel No: [REDACTED]		
Earnings	Deductions	Taxes	Net Pay	Deductions	Current	YTD	
Current: 4,567.09 -	1,643.48 -	1,010.52 =	1,913.09	# BYUP 80/20 PT	50.00	250.00	
YTD: 21,708.16 -	8,535.50 -	4,675.29 =	8,497.37	** Total Health Insurance	50.00	250.00	
Earnings	Hours	Current	YTD	* 401k Savings Plan EE	50.00	250.00	
Regular Salary		2,887.47	15,221.39	* 457 Savings Plan EE	50.00	250.00	
Vacation Leave			1,428.65	* TSERS EE	274.03	1,302.50	
Sick Leave	24.50	569.14	1,422.85	401K Loan	186.44	932.20	
Holiday Comp Leave			1,300.88	457 Def Comp Loan Payment	582.32	2,911.60	
Paid Holiday			185.84	SEANC Dues	14.00	216.75	
State of Emergency Leave	24.50	569.14	569.14	SEANC Insurance	53.59	267.95	
** Total Base Pay		4,025.75	20,128.75	Colonial Life Ins Co	94.25	471.25	
Comm Disease Comp Payout	14.70	341.48	341.48	Protective Life Ins Co	227.83	1,139.15	
Holiday Premium Pay			640.19	CPO Foundation	10.00	50.00	
Shift Premium 10%	12.25	28.42	426.30	American Heritage Ins Co	27.52	137.60	
CDE Worked Premium	7.38	171.44	171.44	SS Police Benev. Assoc.	23.50	117.50	
** Total Other Pay		541.34	1,579.41	CO		239.00	
				** Total Other Deductions	1,593.48	8,285.50	
Total Earnings		4,567.09	21,708.16	Total Deductions	1,643.48	8,535.50	
Tax Authority	Tax Type	Status	EXMT AddlAmt	Cur Tax	YTD Tax	Cur Txbl Earn	YTD Txbl Earn
Federal	Withholding	Single		490.97	2,221.74	4,143.06	19,655.66
Federal	Social Security			280.06	1,330.41	4,517.09	21,458.16
Federal	Medicare			65.49	311.14	4,517.09	21,458.16
North Carolina	Withholding	Single		174.00	812.00	4,143.06	19,655.66
Total Taxes				1,010.52	4,675.29		